

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

APR - 4 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL BRUCE MCDONALD,

Defendant.

4:16CR083 HEA

SUPERSEDING INFORMATION

The United States Attorney charges that:

GENERAL ALLEGATIONS

1. Between September 2009 and April 2016, the defendant, **MICHAEL BRUCE MCDONALD**, a citizen of the United States, resided in the Philippines.
2. The conduct described herein occurred in and around the Philippines, and outside the United States.

COUNT ONE

3. The General Allegations set forth in Paragraphs One and Two of this Superseding Information are re-alleged and expressly incorporated herein as if set out in full.

4. Between on or about August 1, 2015 and February 24, 2016,

MICHAEL BRUCE MCDONALD,

the defendant herein, a citizen of the United States, did travel in foreign commerce, from the United States to the Philippines, and engage in and attempt to engage in illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f)(3), with other persons that is: production of child pornography as defined in Title 18, United States Code, Section 2256(8).

In violation of Title 18, United States Code, Section 2423(c).

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

A handwritten signature in black ink, appearing to read 'Robert F. Livergood', is written over a horizontal line.

ROBERT F. LIVERGOOD, #35432MO
DIANNA R. COLLINS, 59641MO
Assistant United States Attorneys

UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Robert F. Livergood, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.


ROBERT F. LIVERGOOD, #35432MO

Subscribed and sworn to before me this 4 day of April, 2019


CLERK, U.S. DISTRICT COURT

By: 
DEPUTY CLERK